

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

Parker Tirrell, by her parents and next friends)	
Sara Tirrell and Zachary Tirrell, and)	
)	
Iris Turmelle, by her parents and next friends)	
Amy Manzelli and Chad Turmelle,)	
)	
Plaintiffs,)	
)	
v.)	Civil No. 1:24-cv-00251-LM-TSM
)	
Frank Edelblut, in his official capacity as)	
Commissioner of the New Hampshire Department)	
Of Education, et al.)	
)	
Defendants.)	
)	

PARTIALLY ASSENTED-TO MOTION TO EXTEND TIME TO
RESPOND TO THE PROPOSED POTENTIAL INTERVENOR'S
MOTION TO INTERVENE TO, AND INCLUDING, APRIL 21, 2025

Pursuant to Local Rule 7.2 of the Rules of this Court, the United States, on behalf of Federal Defendants, moves this Court to extend the deadline by which it must respond to the potential intervenor's Motion to Intervene (DN 105) to, and including, April 21, 2025. In support of this Motion, Federal Defendants state as follows:

Components of the United States Department of Justice and the Department of Education are reviewing the recently Amended Complaint and the Motion to Intervene.

Federal Defendants' answer to the Complaint (DN 4) is due on April 21, 2025. It will be difficult for the Federal Defendants to properly address the Motion to Intervene until they have completed their review of the Amended Complaint and joined the issues. Also, because of

staffing reductions at the United States Department of Education, the Federal Defendants expect delay.

Federal Defendants respectfully request that this Court extend the deadline in which to respond to the potential intervenor's Motion to Intervene from the current deadline of March 13, 2025 to, and including, April 21, 2025.

Federal Defendants have reached out and obtained consent from all parties, except for counsel for the potential intervenor who has not responded at this time.

The requested extension will not result in the continuance of any hearing, conference or trial. Due to the nature of this Motion, no supporting memorandum of law is required.

Respectfully submitted,

John J. McCormack
Acting United States Attorney

Dated: March 13, 2025

/s/ Robert J. Rabuck
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